

STATEMENT
COMMISSIONER ROBERT M. McDOWELL

Re: Electronic Tariff Filing System (ETFS), Report and Order, WC Docket No. 10-141

As a general matter, I support efforts to streamline Commission procedures to make them more efficient for both the government and the public. This order achieves that goal. It makes good sense that nondominant carriers be required to follow the same electronic tariff filing system that incumbent local exchange carriers have used for years.

So, after today's order goes into effect, gone are the days of relying on an antiquated process of filing tariffs on physical paper and diskettes. At least the "filing process" of the tariff system will be modernized. On that note, I hope that in the future the Commission will look beyond reforming the filing procedures and also consider whether the day will ever come when we can discard the tariff system overall. In fact, I propose that the Commission initiate a proceeding to examine whether, how and when we could accomplish such a goal. If history is to be our guide, we are likely to find that markets and innovation have moved beyond the regulatory structures of the past.

I thank the Wireline Competition Bureau staff their diligence on this order. Also, I commend the Chairman for his leadership in finding ways to modernize the Commission's data collection procedures overall and look forward to working with all of my colleagues on streamlining other cumbersome and outdated FCC procedures.